

**FILED**  
**08-09-2023**  
**Clerk of Circuit Court**  
**Brown County, WI**  
**2023CF001392**  
**Honorable Timothy A**  
**Hinkfuss**  
**Branch 7**

**STATE OF WISCONSIN      CIRCUIT COURT      BROWN COUNTY**

STATE OF WISCONSIN  
Plaintiff,

vs.

CHAD ALLEN WILSON  
2700 S Memorial Drive #C30  
Green Bay, WI 54313  
DOB: 05/31/1973  
Sex/Race: M/I  
Eye Color: Brown  
Hair Color: Brown  
Height: 6 ft 1 in  
Weight: 165 lbs

Defendant.

DA Case No.: 2023BR005422  
Assigned ADA: Jessica R Gereau  
Agency Case No.:

Court Case No.: 23CF \_\_\_\_\_  
ATN:

**CRIMINAL COMPLAINT**

*For Official Use*

Complainant, Jessica R. Gereau, an Assistant District Attorney, being first duly sworn on oath, deposes and says that:

**Count 1: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on or about Tuesday, August 8, 2023, in the Village of Howard, Brown County, Wisconsin, did, having attained the age of 18, knowingly possess motion picture(s) of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m)&(3)(a) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**Count 2: POSSESSION OF CHILD PORNOGRAPHY**

Subsequent to Count 1: The above-named defendant on or about Tuesday, August 8, 2023, in the Village of Howard, Brown County, Wisconsin, did, having attained the age of 18, knowingly possess motion picture(s) of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m)&(3)(a) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

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And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Complainant is an Assistant District Attorney with the Brown County District Attorney's Office and knows of the above offense(s) on information and belief based upon:

**PROBABLE CAUSE:**

The complainant, being duly sworn on oath, swears that she has had the opportunity to review the police reports from Sgt. Matthew Wilson of the Brown County Sheriff's Department, and other documents supporting this complaint referenced herein, which are the types of reports and documents kept in the ordinary course of business, which complainant believes to be truthful and reliable because they have proven to be truthful and reliable on numerous occasions in the past.

The complainant further asserts that based upon her review of the referenced reports and/or supporting documents, the incidents alleged occurred in the Village of Howard, Brown County, Wisconsin.

1. Your complainant's review of the reports of Sgt. Matthew Wilson of the Brown County Sheriff's Office, which state:

On November 15, 2022, I, Sgt. Wilson, examined National Center for Missing and Exploited (NCMEC) CyberTipline report #126881065 that was forwarded to me by the Wisconsin Department of Justice - Division of Criminal Investigation (DCI). Upon reviewing the file, I noted that this report was filed to NCMEC by Dropbox, Inc. on June 24, 2022, at approximately 18:13:14 (UTC). The NCMEC Report indicated there were three uploaded videos on June 8, 2022, at approximately 18:41:54 (UTC). The suspect account which uploaded the three videos in question to their Dropbox, Inc. account was identified by Dropbox, Inc. as the following:

Email Address: neverpetaburningdog@gmail.com (Verified on 10-16-2020 at 12:43:37 (UTC))

User name: Nonya Business

ESP User ID: 1619243056

IP Address: 198.98.58.215 (Login)

09-25-2021 15:07:47 UTC

IP Address: 198.98.58.215 (Login)

09-25-2021 15:09:16 UTC

IP Address: 2603:6000:9646:9100:dd49:6860:d6ef:ae62 (Login)

06-09-2022 18:26:12 UTC

IP Address: 2603:6000:9646:9100:dd49:6860:d6ef:ae62 (Login)

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06-09-2022 18:37:21 UTC

I reviewed the three videos that were included in the CyberTipline report. Below are the descriptions of the videos:

File name: 4DD4CC78-5B43-4154-B8F1-DE6837F0FD4A.MOV

MD5: 2d59bdf967e4e9c0ccbd2c2eb190e798

3b7f5843a2cfea4a32de6b59b18a8415

Time: 36 seconds

Description: The video starts out with an unknown pre-pubescent lying face down on a checkered blanket. The child is wearing a blue/black/white shirt but does not have on any pants or underwear. The child is lying face down on the blanket with her knees bent so their butt is up in the air. The child's ankles appear to be handcuffed together. An adult male's penis is erect and near the child's anus. The adult male ejaculates semen on the child's anus and buttocks. That portion of the video ends and a new video starts. This unknown child is in a similar position as the first child. The child is wearing a blue sweatshirt, no pants or underwear. The child's wrists appear to be tied to their ankles using some sort of black rope. An adult male's erect penis is inserted into the child's anus. The male thrusts his penis in and out of the child's anus. That video ends and a third video starts. This video is what is believed to be a pre-pubescent boy. The boy is completely nude and in a similar stance as the other two videos. He is laying facedown on a bed with his buttocks up in the air. An unknown person is using a white towel to wipe an unknown substance on the boy's buttocks / anus area. The boy's anus appears to have just been penetrated based off the redness of the anus. The first two children in the video are unable to be identified as you can only see small portions of their body and the point of focus is their buttocks area. Based on my training and experience, I believe these children to be pre-pubescent based on their size. I believe the males in the video to be adult males based on their penis size, their body size and pubic hair. I believe this video to be in violation of Wisconsin State Statute 948.12.

File name: 7B3EE754-D9D1-4796-8377-8AD3E8B8E351.MOV

MD5: 3b7f5843a2cfea4a32de6b59b18a8415

Time: 46 seconds

Description: This video starts off with a pre-pubescent boy lying face down in a bed. The boy's knees are bent, and his chest is on the bed so that his buttocks are in the air. An unknown person who appears to be filming this video starts to lick the boy's anus. After a few seconds, the person stops and then positions the camera directly on the boy's buttocks. The unknown person then spreads the boy's buttocks open exposing the boy's anus. Shortly after that, the unknown person is able to be identified as an adult male based on the size of his penis and shaved pubic hair. The adult male starts moving his erect penis around the boy's anus. The male continues to move his erect penis around the boy's anus. The male changes camera positions and places the camera underneath the boy exposing his penis to the camera. The adult male continues to move his erect penis around the boy's anus and scrotum area. The male never inserts his penis into the boy's anus. Towards the end of the video, the male ends up turning the camera and exposes the boy's face briefly. I believe this video to be in violation of Wisconsin State Statute 948.12.

File name: F1BE59E9-4E12-4C31-870C-4F25D571193C

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MD5: f5dc6decbf2d06f1609555fa4ae82d53

Time: 3 minutes and 50 seconds

Description: This video starts out with a pre-pubescent boy who appears to be lying on his back. The boy appears to have a black shirt on but no pants and underwear. The boy's penis is exposed directly to the camera. The boy's legs are spread open and there is an adult male inserting his penis into the boy's anus. The adult male continues thrusting his hips causing his penis to go in and out of the boy's anus. After about 30 seconds, the male's penis is removed from the boy's anus and the camera moves to reveal the boy's anus completely on camera. The male uses his fingers to pry open the boy's anus and it appears there is semen in the boy's anus. After about 55 seconds of that, the male then re-inserts his penis into the boy's anus. After a few seconds of that the camera moves once again and the male starts rubbing the boy's right foot. The camera is far enough zoomed out that the boy's partial face is revealed. The boy is covering his face with his hands. Based on the boy's size, he appears to be 6-8 years of age. After massaging the boy's feet for a bit the male attempts to take the boy's shirt up but the camera goes dark. A short time later, the male's left hand is seen on camera massaging the boy's penis. The male massages and attempts to masturbate the boy's penis until the video ends. I believe this video to be in violation of Wisconsin State Statute 948.12.

On November 17, 2022 at approximately 3:25 pm, DCI submitted an administrative subpoena to Charter Communications for the IP address 2603:6000:9646:9100:dd49:6860:d6ef:ae62 which was used on June 9, 2022 at approximately 18:37 (UTC).

This IP address was used for a login on June 9, 2022, which is associated to the user name "Nonya Business".

On November 25, 2022, DCI received a response from Charter Communications, which gave the following information:

- Subscriber Name: CHAD WILSON
- Subscriber Address: 2700 S MEMORIAL DR C30, Green Bay, WI 54313
- Phone Number: (920) 371-5050

I searched Police databases for CHAD WILSON. I identified CHAD WILSON as CHAD ALLEN WILSON, M/W, DOB: 5-31-73. In searching Police Databases 920-371-5050 is the listed cell phone number for WILSON. In checking DOT records, WILSON lists his address as 2700 S. Memorial Drive, Apt C30, in the Village of Howard, Brown County, WI 54313.

On August 7, 2023, I called the landlord for the apartment, KIM NELSON. In speaking with KIM, she verified that WILSON's address is 2700 S. Memorial Drive, Apt C30. KIM stated that WILSON has occupied that particular apartment since December 3, 2021.

Based on this investigation, I drafted a search warrant on August 7, 2023.

I presented the search warrant to the Honorable Brown County Circuit Court Judge Hammer. Judge Hammer reviewed the search warrant and granted it at approximately 2:34 pm. Judge Hammer and I both signed the search warrant at that time.

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On August 8, 2023, multiple investigators and I attempted to execute the search warrant on WILSON's residence. After waiting several hours for any movement, I contacted a Law Enforcement resource who had knowledge of WILSON's work location. The Law Enforcement resource indicated that WILSON was currently at work at the Oneida Nation Elementary School, N7125 Seminary Road, Oneida Outagamie County, WI. Sgt. Holschbach went to that location and located WILSON's vehicle.

Oneida Police Department was contacted and met with Detectives and I at the Oneida Tribe Norbert Hill Center, N7210 Seminary Road, Oneida, Outagamie County, WI. I updated the Oneida PD Officer and with the assistance of some staff at the elementary school, WILSON was located. WILSON was transported from the school to the Norbert Hill Center and turned over to me.

While explaining things to him, the rest of the Detectives went to WILSON's residence and served the search warrant.

I escorted WILSON to my unmarked squad car and began talking to him. I introduced myself to WILSON and explained who I was. I informed WILSON that because he was brought by a squad and he was not free to leave, I would read him his Miranda Rights. I then read WILSON his Miranda Rights verbatim from a Brown County Miranda Rights form. WILSON understood his rights and agree to answer questions. WILSON and I signed the form at approximately 8:50 am.

I confirmed that WILSON lived at 2700 S. Memorial Drive, #C30, in the Village of Howard, Brown County, WI. I obtained WILSON's cellphones; one work cellphone and one personal cellphone. I then informed WILSON that we were going to serve a search warrant at his residence. WILSON understood and had no questions. WILSON willingly turned over the key to me so we could gain access to the apartment.

WILSON then made the following written statement:

On Tuesday, August 8, 2023, I, Chad Allen Wilson, was working at the Turtle School on the Oneida Reservation. While working, I was approached by a female Oneida PD Officer. I was placed in the backseat of her squad car and transported to the Norbert Hill Center. I was let out of the backseat by the Officer then Sgt. Wilson greeted me and asked me to take a seat inside his unmarked squad car.

Sgt. Wilson introduced himself and stated he was working an investigation and my name came up. Sgt. Wilson explained the investigation was in reference to child pornography and that he had a search warrant to search my residence. Sgt. Wilson read me my Miranda Rights and I agreed to waive my rights and answer questions.

I, Chad Allen Wilson, live at 2700 S. Memorial Drive #C30. I live there alone with my cat. A friend of mine, Laura Manty, rents my spare bedroom as her office. Luara has not been at the residence for about two weeks as she is out of town for work. I have wireless internet throughout the apartment and that is through Charter Communications aka Spectrum. The passcode to the wireless internet is "Scout001\* ". I have given out the passcode to people in the past.

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I have some social media, but I mainly am on Facebook. I also have a Twitter account and a Snapchat account. I use several emails; chadallenwilson@gmail.com and neverpetaburningdog@gmail.com.

I do view pornography on the internet. I am into all types of pornography, but mainly male on male pornography. I typically use www.xvideos.com, www.pornhub.com and www.xhampster.com I typically only view the videos and images but do not download them. I have viewed some child pornography online, but I usually move on from it when I see it.

I know child pornography to be viewing a video or image of a nude person under the age of 18 years-old. Based on my own personal experiences with my nieces and nephews, I know the difference between a 15-18 year-old and an 8 year-old.

I have two cellphones; one Samsung Galaxy S22 that I use for work and one Samsung Galaxy S22 that I use as my personal cellphone. I have several old laptops at my residence.

Sgt. Wilson asked me about Dropbox. I told Sgt. Wilson that I use to use Dropbox but no longer have it because I forgot the password. Sgt. Wilson explained that this tip was from Dropbox and it was likely that Dropbox closed my account because of this investigation. I told Sgt. Wilson that I received a link in my Dropbox from an unknown person that I met on "Tumble ". I am not sure who this person was but they sent me a Dropbox link that had all sorts of images and videos of child pornography. The pornography was infants all the way up to 18 years-old. I do have an interest in viewing child pornography, more specifically 15 year-old boys. I didn't like the younger stuff that was sent to me because there is nothing I can do with that. I did not masturbate to the child pornography that was sent to me.

During the interview, Sgt. Wilson explained that since I was not on my property when the cellphones were seized that he could not search them. He explained the consent process to me as well as the search warrant process. I told him that I would consent to the search of both my cellphones. Sgt. Wilson and I signed a consent to search form after he explained it to me.

I understand that possessing child pornography is illegal and morally wrong.

After the statement, WILSON and I reviewed it, making changes as needed. WILSON and I signed the statement at approximately 10:18 am.

WILSON remained in custody while the search and forensics was being completed in case consent wanted to be revoked.

During the course of the search warrant, multiple devices were seized and analyzed by AFCA Frank Angel. During the course of the analyzation, AFCA Angel located possible child pornography. AFCA Angel created a USB with two videos and turned it over to me.

The following are the descriptions of those videos:

File name: 4\_5969729229741361823.mp4

Path: Media/Internal storage/Android/data/org.telegram.messenger/files/Telegram/Telegram

Video/4\_5969729229741361823.mp4



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MD5: 752e912b4e997f6ede3a3e87db86c229

Length: 40 Seconds

Description: The video starts with what appears to be a pubescent aged male wearing no shirt and some sort of shorts however his erect penis is sticking out of the top of the shorts. There is a pre-pubescent aged boy performing oral sex on the male. While the boy is performing oral sex on the male, the male is using his hands to guide the boy's head back and forth on his penis. It appears the boy is using one of his hands to possibly be masturbating while performing oral sex on the male. After about 19 seconds, the boy stands up and reveals that they are in a bedroom and the boy is naked. The boy then starts kissing the male on the lips. After about 10 seconds of that the camera moves to reveal the male and the boy masturbating themselves. The video ends with the boys separating. Based on my training and experience and the stature of both the male and the boy, I believe the male to be an pubescent aged male based on size of his body compared to the boy and his penis size. The boy appears to be a pre-pubescent boy based on the size of his body, lack of pubic hair and penis size.

File name: 1\_5028318015305810554.mp4

Path: Media/Internal storage/Android/data/org.telegram.messenger/files/Telegram/Telegram

Video/1\_5028318015305810554.mp4

MD5: e555a62d00887c2c6b310a3847a359c2

Length: 3 minutes and 34 seconds

Description: This video starts out in what appears to be in a residential setting. There is a pre-pubescent boy standing in front of the camera, naked, receiving oral sex from an unknown person who appears to be on their knees. The boy's penis is exposed to the camera. After approximately 22 seconds, the person who his giving the boy the oral sex stops and moves the camera. Once the camera is moved, it is revealed that the person giving the boy oral sex is an adult female. The adult female moves the camera underneath her body. At this point, the camera is underneath her and she is standing, but bent over at the waist with her arms towards the ground. The boy comes in behind her and the female grabs the boy's penis and inserts into either her vagina or anus. The boy has sexual intercourse with the female and as he is doing that the female moves the camera to her right side which shows the boy thrusting his penis inside of the female. At 1 minute 16 seconds, the female speaks to the boy in a foreign language and the boy slaps her buttocks multiple times. The boy attempts to stop however the female says something and then forces the boy's penis back into her vagina. At approximately 3 minutes and 26 seconds the female stops and turns the camera towards the boy. The video ends a short time later. Based on my training and experience, the boy appears to be a pre-pubescent boy based on his body size, penis size, lack of maturity and pubic hair. The female appears to be an adult female based on body size, breast size, maturity and pubic hair.

Based on my training and experience, I believe that both of these videos constitute child pornography in violation of Wisconsin State Statute 948.12.

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Based on the foregoing, the complainant believes this complaint to be true and correct.

Subscribed and sworn to before me on 08/09/23 Electronically Signed By:

Electronically Signed By:

Kimberly A Hardtke

Assistant District Attorney

State Bar #: 1087991

Jessica R. Gereau

Complainant